

REMARKS

Applicant adds new dependent claims 8-15; therefore, claims 1-15 are now pending in the application.

Applicant corrects a typographical error in claim 1, and requests the Examiner to approve this amendment. This is merely a correction of a typographical error and does not narrow the scope of claim 1. No estoppel is created.

The Examiner rejects all of the pending claims under 35 U.S.C. §103(a) as being unpatentable over Ikedo in view of Black et al. (Black).

Applicant respectfully traverses this rejection as follows.

Applicant's claimed invention provides apparatuses and a method for creating a portrait by combining portrait parts comprising unique combinations of features (claims 1, 5 and 6) and method steps (claim 7), including *inter alia*, inputting edition orders to edit an image of the parts, and a computation unit for deforming (by, for example, moving, rotating, inverting, expanding, and/or compressing) and editing the images of portrait parts in accordance with the orders.

Contrary to the Examiner's analysis, Ikedo does not disclose, teach or suggest inputting editing orders to edit images of portrait parts, as required by Applicant's independent claims 1, 5, 6 and 7. In particular, col. 5, lines 24-29 cited by the Examiner (and reproduced below for reference) have nothing to do with editing of an image of a selected part by, for example, editing the dots and/or lines of the image, as required by Applicant's claims 1, 5, 6 and 7.

The data of "reference style of face" which decide the areas and the positional relations to be occupied by respective parts to make up a montage picture are also part of the system in addition to the data for patterns. In the embodiment, four types of data, "standard," "thick," "thin" and "child," are given as "reference styles of face." (Ikeda, col. 5, lines 24-29.)

That is, Ikeda's "reference style of face" has nothing to do with editing of an image of a portrait part.

Likewise, Ikeda's scaling process (described at col. 17, line 60 through col. 18, line 8, also cited by the Examiner) where "a predetermined number of dots in length and breadth are added to the present plotting area to enlarge the plotting area" (Id. at col. 18, lines 2 and 3), does not in any way teach or suggest editing an image of a portrait part, or inputting an edition order for doing so, as required by Applicant's independent claims 1, 5, 6 and 7.

Black, which is directed to a method for recognizing facial expressions and gestures in a sequence of images, is not at all related to Ikeda and does not supply the above-noted deficiency.

Accordingly, Applicant's independent claims 1, 5, 6 and 7, as well as the dependent claims 2-4 (which incorporate all the novel and unobvious features of their base claim 1) would not have been obvious from Ikeda and Black at least for the reasons set forth above.

Applicant adds new claims 8-15 to cover some of the specific novel implementations of the embodiments of Applicant's invention as described, for example, at page 11, lines 13-16 of the specification.

In view of the foregoing, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which

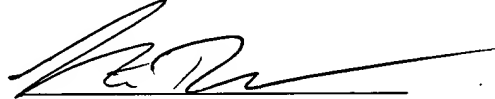
AMENDMENT UNDER 37 C.F.R. § 1.111
Appln. No.: 09/669,838

Atty Dkt No. Q60958

the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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